

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50.

Defendants.

Civil Action No.
1:22-cv-00187-LJV-JJM

**DECLARATION OF JULIANNE
OSBORNE IN SUPPORT OF
MOTION TO COMPEL
PRODUCTION**

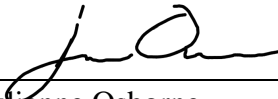
I, Julianne Osborne, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declare as follows:

1. I am an attorney with Latham & Watkins LLP, counsel to Defendant Skyrise, Inc. (“Skyrise”) I am familiar with this matter and the facts set forth herein.
2. I submit this Declaration in support of Skyrise’s Motion to Compel Production.
3. Attached as Exhibit A is a true and correct copy of Moog, Inc.’s (“Moog’s”) Responses to Defendant Skyrise, Inc.’s First Set of (Expedited) Requests for Production, dated April 13, 2022.
4. Attached as Exhibit B is true and correct copy of a letter sent by counsel for Skyrise to counsel for Moog on June 4, 2022.
5. Attached as Exhibit C is a true and correct copy of an email sent by counsel for Skyrise to counsel for Moog on June 9, 2022.
6. Attached as Exhibit D is a true and correct copy of email correspondence between counsel for Moog and counsel for Skyrise dated June 20, 2022 to June 27, 2022.

7. Attached as Exhibit E is true and correct copy of Moog Inc.'s First Set of Requests for Production of Documents and Things to Skyrise, Inc., dated March 21, 2022.

8. On at least June 9, 2022 and June 24, 2022, counsel for Skyrise met and conferred via Zoom with counsel for Moog to discuss, among other issues, Moog's unwillingness to produce relevant documents in response to Skyrise's Requests for Production. These discussions are further reflected in the written correspondence between counsel, described above.

Dated: June 30, 2022



Julianne Osborne